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Attorneys for Adhara Aerospace and Defense
LLC

UNITED STATES BANKRUPTCY COURT

CENTRAL DISTRICT OF CALIFORNIA

In re:

SKYLOCK INDUSTRIES,

Debtor.

CASE NO. 24-BK-17820-BB-11

**REQUEST FOR SPECIAL NOTICE BY
ADHARA AEROSPACE AND DEFENSE
LLC**

TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that pursuant to 11 U.S.C. § 1109(b) and Bankruptcy Rules 2002 and 9010 (b) of the Federal Rules of Bankruptcy Procedure, Adhara Aerospace and Defense LLC (“Adhara”), hereby requests that all matters which must be noticed to creditors, any creditors’ committees, any equity security holders’ committee, and any other parties in interest, whether sent by the Court, the Debtor, or any Trustee or other party in the case, be sent to the following addresses, and that the following addresses be added to the Court’s Master Mailing List:

Rachel P. Stoian
Dorsey & Whitney LLP
167 Hamilton Ave. Ste. 200
Palo Alto, CA 94301
Telephone: (650) 843-2708
Facsimile: (650) 618-8659
Email: stoian.rachel@dorsey.com

PLEASE TAKE FURTHER NOTICE that neither this Request for Special Notice nor any subsequent appearance, pleading, claim or suit, is intended to waive (i) Adhara's right to have final orders in non-core matters entered only after *de novo* review by a district judge, (ii) Adhara's right to trial by jury in any proceedings or trial so triable herein or in any case, controversy or proceeding relating hereto, (iii) Adhara's right to have the reference withdrawn by the District Court in any matter subject to mandatory or discretionary withdrawal, or (iv) any other rights, claims, actions, defenses, setoffs, or recoupments to which Adhara is or may be entitled under agreements, in law, in equity or otherwise, all of which rights, claims, actions, defenses, setoffs, and recoupments Adhara expressly reserves. Further, this Request for Special Notice constitutes a special appearance and is not to be deemed a consent to or waiver of the right to challenge the jurisdiction of the Bankruptcy Court, including without limitation, the jurisdiction of the Court to adjudicate non-core matters, all of which rights are reserved without prejudice.

Dated: September 26, 2024

DORSEY & WHITNEY LLP

By: /s/ Rachel P. Stoian

RACHEL P. STOIAN
Attorneys for Adhara Aerospace and
Defense LLC

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

167 Hamilton Ave. Ste. 200
Palo Alto, CA 94301

A true and correct copy of the foregoing document entitled (*specify*): **Request for Special Notice by Adhara Aerospace and Defense LLC**

will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On September 26, 2024, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Jeffrey S. Shinbrot, counsel to Debtor (jeffrey@shinbrotfirm.com)
David Samuel Shevitz, Office of the United States Trustee (David.S.Shevitz@usdoj.com)

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (*date*) _____, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

September 26, 2024 Rachel P. Stoian
Date Printed Name

/s/ Rachel P. Stoian
Signature